

**STATE OF RHODE ISLAND  
PROVIDENCE, SC**

**DISTRICT COURT  
SIXTH DIVISION**

**OTORO, LLC**

**V**

**CA No.**

**JOSE FARIA, MARTA FARIA,  
individually and MARTA FARIA  
as Administratrix of the Estate  
of Apolonia Moraes**

**COMPLAINT FOR EVICTION FOR REASON  
OTHER THAN NON PAYMENT OF RENT**

1. Plaintiff, Otoro, LLC, owns the premises at 120 Lena Street, East Providence, RI 02914 (hereinafter, "the premises") pursuant to a Foreclosure Deed (Ex. A).
  - a. The former owner, Apolonia Movias, passed away on June 10, 2014. However her spouse and daughter still unlawfully remain in possession of the premises after the foreclosure sale.
2. Defendant, Jose Faria, unlawfully remains in possession of the premises as a tenant at sufferance. He remains in possession of the premises without the permission or consent of, or by agreement with, the Plaintiff.
3. Defendant, Marta Faria, unlawfully remains in possession of the premises as a tenant at sufferance. She remains in possession of the premises without the permission or consent of, or by agreement with, the Plaintiff.
4. Defendant, Marta Faria, as Administratrix of the Estate of Apolonia Moraes, unlawfully remains in possession of the premises as a tenant at sufferance. The Estate remains in possession of the premises without the permission or consent of, or by agreement with, the Plaintiff.
5. Defendants have been provided notice to vacate the premises pursuant to General Laws § 34-18.1-2 (Ex. B) (Ex. C) (Ex. D).
6. Defendants have failed to vacate the premises.
7. Plaintiff demands possession of the premises.

Case 1:19-cv-00427-MSM-LDA Document 33-2 Filed 05/03/21 Page 2 of 2 PageID #: 613

8. Plaintiff further demands payment of the fair market value of the Defendants' use and occupancy of the premises for the period they were tenants at sufferance.

WHEREFORE Plaintiff hereby demands Judgment for possession and the fair market value of the premises for the time period Defendants used and occupied the premises as tenants at sufferance, and costs.

/s/ James Moretti

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